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September 10, 2012

VIA FACSIMILE

Honorable Paul G. Gardephe
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

*The modified briefing schedule is approved.
Page limits are increased to 45 pages.*

SO ORDERED:

Paul G. Gardephe

Paul G. Gardephe, U.S.D.J.

Sept 13, 2012

Dear Judge Gardephe:

We represent defendants News Corporation, K. Rupert Murdoch and James Murdoch (and now NI Group Limited) in the above-referenced putative securities class action. We respectfully write to request a brief extension of 11 days to file motions to dismiss, which are currently due on September 14, 2012, in light of the recent service of the amended complaint made on NI Group Limited.

Specifically, on July 31, 2012, Plaintiffs filed an amended complaint which added as defendants for the first time NI Group Limited (a United Kingdom corporation) and Mr. Les Hinton. We understand that service on NI Group Limited was made on August 29, 2012 through the Hague Convention. We will now be representing NI Group Limited in this matter.¹ Plaintiffs have agreed to modify the briefing schedule as follows:

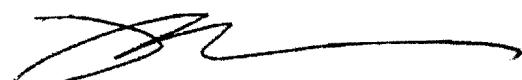
¹ This letter is submitted preserving all of NI Group Limited's defenses. We do not represent either Ms. Rebekah Brooks or Mr. Les Hinton, neither of whom we understand have been served.

Honorable Paul G. Gardephe
September 10, 2012
Page 2

- September 25, 2012: Motions to dismiss and supporting memoranda of law to be served.
- November 6, 2012: Plaintiffs' opposition papers to be served.
- November 30, 2012: Reply papers to be served.²

In addition, we respectfully request permission to file supporting briefs (or a combined brief) for the defendants we represent not to exceed 50 pages. Plaintiffs consent to this request provided they also receive 50 pages to respond.

Respectfully,


Jay B. Kasner

cc: Dennis J. Herman, Esq. (via email)

² Since the Court entered the briefing schedule on July 3, 2012, defendants have not made any requests for extensions.